

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 7:19-cv-00354
)	
SOUTHERN COAL CORPORATION, et al.,)	
)	
Defendants.)	

MOTION FOR PROTECTIVE ORDER

Under Federal Rule of Civil Procedure 26(c), Defendants, with the acknowledgement of counsel for the United States, moves the Court for entry of the Protective Order that is attached hereto as Exhibit A (“Protective Order”).

This litigation will require the Defendants to seek, produce, and disclose certain categories of documents and information that contain sensitive and confidential financial information. Entry of the Protective Order is necessary to protect the Defendants’ confidential, or sensitive information from public disclosure and from any use other than prosecuting this litigation. The Protective Order will facilitate the flow of documents and information between the parties by ensuring such confidential and sensitive is protected appropriately and will not be disclosed unless necessary.

The Government has reviewed the Protective Order. The Defendants requests entry thereof for the reasons stated herein.

Respectfully submitted,

SOUTHERN COAL CORPORATION, et al.

By: /s/ Aaron Balla Houchens
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and the foregoing was electronically transmitted through the CM/ECF system to the following CM/ECF participants:

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